

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Alpha Systems, Inc.
5100 Beck Drive,
5120 Beck Drive, and
21680 Protecta Drive
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-12831-00504	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 22, 2002 Expiration Date: March 22, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates two (2) plants on Beck Drive which manufacture adhesives, fiberglass counter tops, and sinks, and one (1) plant on Protecta Drive Plant which manufactures fiberglass molds and plastic/vacuum formed items.

Responsible Official:	Steve Rusincovitch
Source Address:	5100 Beck Drive, Elkhart, Indiana 46516 5120 Beck Drive, Elkhart, Indiana 46516 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address:	5120 Beck Drive, Elkhart, Indiana 46516
General Source Phone Number:	
SIC Code:	2189, 3088
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

The two (2) plants are owned by one (1) individual, located on the same property (contiguous property) and have the same owner but have different SIC codes: The Beck Drive Plants manufacture adhesives, fiberglass counter tops, and sinks, used exclusively by the motor home industry, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed items, with an SIC code of 3088. This determination was previously made in Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000.

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

5100 Beck Drive Building

- (d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.

- (e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) dust collector, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.

- (f) One (1) sink/counter top closed molding line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts are conveyed to the 0.8 million Btu/hr (MMBTU/hr) natural gas-fired dryer, identified D1 for drying as a final product.
- (g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr and exhausts into the building.
- (h) Two (2) manual mixer, designed as MM-1 and MM-2, with a maximum capacity of 430 lbs each and exhausts into the building.
- (i) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.
- (j) One (1) Empire Blast Cabinet used to sand blast the marble tops, sinks and flat tops, vented to a dust collector designed as DC-2 and then internally.
- (k) Ten (10) hand grinders used for the final finish touch up operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Protecta Drive Plant:

- (l) One (1) marble top mold booth, designated as #1, with a maximum throughput of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.
- (m) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

**A.4 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]**

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) woodworking and plastics machining area, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere. (326 IAC 6-3-2)
- (b) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks. (326 IAC 8-9)

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental

Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (c) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered

timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to

or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (a) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this

existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the

appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ, approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and Evansville EPA, upon request and Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (a) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (b) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred,

the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as

defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply

with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Description [326 IAC 2-7-5(15)]: 5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3, with a maximum capacity of 300 gallons, with filling, dispersion, and cleanup operations all venting to stack V1.

5100 Beck Drive Building

- (d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.
- (e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) dust collector, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.
- (f) One (1) sink/counter top closed molding line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts are conveyed to the 0.8 million Btu/hr (MMBtu/hr) natural gas-fired dryer, identified D1 for drying as a final product.
- (g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr and exhausts into the building.
- (h) Two (2) manual mixer, designed as MM-1 and MM-2, with a maximum capacity of 430 lbs each and exhausts into the building.
- (i) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.
- (j) One (1) Empire Blast Cabinet used to sand blast the marble tops, sinks and flat tops, vented to a dust collector designed as DC-2 and then internally.
- (k) Ten (10) hand grinders used for the final finish touch up operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Facility Description [326 IAC 2-7-5(15)] (continued):
Protecta Drive Plant:

- (l) One (1) marble top mold booth, designated as #1, with a maximum throughput of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.
- (m) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Hazardous Air Pollutant (HAP) Limit [326 IAC 2-4.1]

Pursuant to the Significant Permit Revision 039-12282-00504, (issued December 4, 2000) to MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building (as described above) the input HAP shall be less than 10 tons of a single HAP or twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period so that the requirements of 326 IAC 2-4.1 (Toxics) do not apply.

D.1.2 BACT VOC Limit [326 IAC 8-1-6]

Pursuant to the Significant Permit Revision 039-12282-00504, (issued December 4, 2000) to MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building, the input VOC shall be less than 25 tons per consecutive twelve (12) month period, so that the requirements of 326 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from

- (a) sawing and sanding with a process weight rate of 1614 pounds per hour shall not exceed 3.55 lb or PM per hour,
- (b) blasting with a process weight rate of 1 pound per hour shall not exceed 0.02 lb of PM per hour,
- (c) flat bed sanders and hand grinders with a process weight rate of 538 pounds per hour shall not exceed 1.7 lb of PM per hour,
- (d) marble top mold booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The correlating dust collectors and dry filters shall be in operation at all times the sawing and sanding, abrasive blasting, flat bed sanders and hand grinders, woodworking and plastics machining, and the marble top mold booth are in operation, in order to comply with this limit.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with Condition D.1.1 and D.1.2 shall be demonstrated within 30 days of the end of

each month based on the total volatile organic compound usage for the twelve (12) consecutive month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

Pursuant to MSOP 039-11066-00504, issued on October 6, 1999, and in order to comply with D.1.3, the corresponding PM control equipment shall be in operation and control emissions from the sawing and sanding, blasting, flat bed sanders and hand grinders, and marble top mold booth at all times when the facilities are in operation.

D.1.7 Monitoring

- (a) The sawing and sanding operation, blasting, hand grinding, all controlled by dust collectors have applicable compliance monitoring conditions as specified below:
 - (1) Visible Emissions Notations
 - (A) Visible emission notations of the blasting stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (B) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (C) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (D) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (E) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Parametric Monitoring:
 - (A) The Permittee shall take readings of the total static pressure drop across the dust collector, as least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3 to 6 inches of water. The Preventive Maintenance Plan for the dust collector should be followed when the pressure reading is outside of this range for any one reading.
 - (B) An inspection shall be performed each calendar quarter of the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors replaced.
 - (C) In the event that a dust collector's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.

- (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
- (b) The spray coating has applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the over spray from the surface coating booth stack SV-001 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and/or D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and/or D.1.2.
 - (1) The amount and VOC/HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC/HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each day month;
 - (5) The total VOC/HAP usage for each month; and
 - (6) The weight of VOCs/HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7(a), the Permittee shall maintain a log of weekly readings and quarterly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) To document compliance with Condition D.1.7(b), the Permittee shall maintain a log of

weekly over spray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] of Insignificant Activity:

One (1) woodworking and plastics machining area, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere and consists of the following:

- (1) Ten (10) inch table saw;
- (2) Sixty (60) inch edge sander
- (3) Two (2) fourteen (14) inch band saws;
- (4) Ten (10) inch swing saw;
- (5) Three (3) router tables;
- (6) One (1) vacuum former machine;
- (7) One (1) CNC router;
- (8) Miscellaneous hand operated saws, grinders and drills; and
- (9) One (1) hydraulic press.

Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from woodworking and plastics machining operations with a process weight rate of 350 pounds per hour shall not exceed 1.28 lb of PM per hour, based on the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Alpha Systems, Inc.
Source Address: 5100 and 5120 Beck Drive; 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-12831-00504

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Alpha Systems, Inc.
Source Address: 5100 and 5120 Beck Drive; 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-12831-00504

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- ☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - ☐ The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Alpha Systems, Inc.
Source Address: 5100 and 5120 Beck Drive; 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-12831-00504
Facility: 5120 Beck Drive and 5100 Beck Drive Buildings
Parameter: VOC input
Limit: 25 tons per 12 consecutive month period

YEAR: _____

Month	Column 1 This Month	Column 2 Previous 11 Months	Column 1 + Column 2 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted By: _____

Signature: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Alpha Systems, Inc.
Source Address: 5100 and 5120 Beck Drive; 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-12831-00504
Facility: 5120 Beck Drive and 5100 Beck Drive Buildings
Parameter: HAP input
Limit: 10 tons of a single HAP or 25 tons of a combination of HAPs per 12 consecutive month period

YEAR: _____

Month	Column 1 This Month	Column 2 Previous 11 Months	Column 1 + Column 2 12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted By: _____

Signature: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Alpha Systems, Inc.
Source Address: 5100 and 5120 Beck Drive; 21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
Part 70 Permit No.: T039-12831-00504

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Alpha Systems, Inc.
 Source Location: 5100 Beck Drive, 5120 Beck Drive, and 21680 Protecta Drive, Elkhart, IN 46516
 County: Elkhart
 SIC Code: 2189, 3088
 Operation Permit No.: T039-12831-00504
 Permit Reviewer: Holly M. Stockrahm

On November 26, 2001, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Alpha Systems, Inc. had applied for a Part 70 Operating Permit to operate a stationary adhesive, fiberglass sink and counter top manufacturing operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Based on the comments received from the source on January 10 and January 14, 2002, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted, the Table of Contents has been revised as necessary).

Comment 1:

326 8-9 does not apply to Elkhart County, and therefore, the record keeping requirements under D.2.2 should be deleted.

Response to Comment 1:

OAQ agrees. Condition D.2.2 has been deleted.

~~Record Keeping and Reporting~~

~~D.2.2 VOC [326 IAC 8-9]~~

~~Pursuant to 326 IAC 8-9 (Volatile Organic Storage Vessels), the Permittee shall maintain records and submit the following to IDEM, for the volatile organic storage tanks with capacities less than 39,000 gallons:~~

- ~~(a) the vessel identification number,~~
- ~~(b) the vessel dimensions, and~~
- ~~(c) the vessel capacity.~~

Comment 2:

Alpha Systems would like to see the description of the solvent mixers (A.3 (a), (b), and (c)) to include the phrase, with filling, dispersion, and cleanup operations all venting to stack V1, to better describe the process.

Response to Comment 2:

OAQ agrees. Descriptions A.3 (a), (b), and (c), shall be revised as follows:

A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, ~~this tank vents inside the building~~ with filling, dispersion, and cleanup operations all venting to stack V1.
- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, ~~this tank vents inside the building~~ with filling, dispersion, and cleanup operations all venting to stack V1.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3, with a maximum capacity of 300 gallons, ~~this tank vents inside the building~~ with filling, dispersion, and cleanup operations all venting to stack V1.

Comment 3:

The mixer descriptions in the TSD document under insignificant (k)(2) should be removed, as these are listed for significant emission units now.

Response to Comment 3:

OAQ does not revise the Technical Support Document (TSD) after public notice in order to maintain historical documentation of the permit that goes on public notice. If changes are necessary, this document, the TSD addendum will show additional information or changes.

- (k) Activities or categories of activities with individual or combinations of HAPs:
 - (1) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks.
 - ~~(2) One (1) solvent-based adhesives production area, consisting of two (2) mixing vessels designated as M-1 and M-2, one (1) bulk product filling machine designated as F1, and exhausts to a stack designated as V1. M1 has a maximum raw material throughput of 586 pounds per hour and a maximum capacity of 300 gallons. M2 has a maximum raw material throughput of 277 pounds per hour and a maximum capacity of 275 gallons. F1 has a maximum raw material filling rate of 350 pounds per minute.~~

Comment 4:

The description in A.2 should say that the Beck Drive plants manufacture adhesives, fiberglass counter tops, and sinks, and the Protecta Drive Plant manufactures fiberglass molds and plastic/vacuum formed items.

Response to Comment 4:

OAQ agrees. A.1 and A.2 has been changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates ~~a stationary adhesive, fiberglass sink and countertop manufacturing operation~~ **two (2) plants on Beck Drive which manufacture adhesives,**

fiberglass counter tops, and sinks, and one (1) plant on Protecta Drive Plant which manufactures fiberglass molds and plastic/vacuum formed items. ~~adhesive, fiberglass sink and countertop manufacturing operation.~~

Responsible Official: Steve Rusincovitch
Source Address: 5100 Beck Drive, Elkhart, Indiana 46516
5120 Beck Drive, Elkhart, Indiana 46516
21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
General Source Phone Number:
SIC Code: 2189, 3088
County Location: Elkhart
Source Location Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This adhesive, fiberglass sink and countertop manufacturing operation consists of two (2) plants:

(a) Beck Drive Plant (two (2) buildings), located at 5120 and 5100 Beck Drive, Elkhart, Indiana 46516; and

(b) Protecta Drive Plant, located at 21680 Protecta Drive, Elkhart, Indiana 46516.

The two (2) plants are owned by one (1) individual, located on the same property (contiguous property) and have the same owner but have different SIC codes: The Beck Drive Plants manufacture adhesives, ~~and sealants~~ fiberglass counter tops, and sinks, used exclusively by the motor home industry, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass **molds and plastic/vacuum formed items** ~~counter tops and sinks~~, with an SIC code of 3088. This determination was previously made in Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The following new rule cite to B.2 Permit Term has been added to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

2. B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission

limitation, ~~except as provided in 326 IAC 2-7-16.~~

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- ~~(g) Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

3. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

4. B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
- (1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

5. (b) has been removed from B.13 Permit Shield. Since B.14 Prior Permit Conditions Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

6. EPA has stated that there cannot be a requirement in a federal permit to require a condition in a permit, then for IDEM, OAQ, to allow it not to be considered a deviation when the source does not perform it [see 40 CFR 70.6(a)(6)(i)]. IDEM, OAQ, may use enforcement discretion in these cases, but IDEM, OAQ, cannot create an exemption through the TV permit. In order to clarify the facility specific events that would not qualify as a deviation, IDEM, OAQ, has revised B.15 as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

7. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ, has re-visited this issue with EPA. EPA requested that IDEM, OAQ, clarify C.7 Asbestos Abatement Projects, so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. IDEM, OAQ, has also changed C.16 Actions Related to Noncompliance Demonstrated by a Stack Test, it now requires a certification by the Responsible Official (R.O.) for the notification sent in response to non-compliance with a stack test. There are 3 conditions that EPA and IDEM agree do not need a Responsible Official certification; B.11 Preventive Maintenance Plan, B.12 Emergency Provisions, and C.8 Performance Testing. B.11 & C.8, PMPs and stack test protocol, do not qualify as an application, report, or compliance certification, and therefore are not required to be certified. The emergency report is excused from certification because the source only has 2 days to submit it, and the same information will be certified when it is included in the Quarterly Deviation and Compliance Monitoring Report and the Annual Compliance Certification.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management

Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
101 NW Martin Luther King Jr. Blvd
Room 250
Evansville, Indiana 47708

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
 - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

8. EPA states that Part 70 does not allow an excuse from reporting failures. IDEM, OAQ, may use enforcement discretion, but cannot create an exemption through the permit. The condition has been re-organized to clarify it's intent.

C.15 Compliance Monitoring Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) ~~The Permittee is required to prepare implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

- ~~(1) This condition;~~
- ~~(2) The Compliance Determination Requirements in Section D of this permit;~~
- ~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~
- ~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) **A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ and Evansville EPA, upon request and shall be subject to review and approval by IDEM, OAQ, and Evansville EPA . The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:**
- ~~(A)(1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
- ~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

- (1) Reasonable response steps shall be taken as set forth in the Permittee's**

current Compliance Response Plan; or

- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.**
- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ The Permittee is excused from taking ~~not required to take~~ any further response steps for any of the following reasons:**
- (1) A false reading occurs due to the malfunction of the monitoring equipment ~~and This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.**
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.**
 - (3) An automatic measurement was taken when the process was not operating.**
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.**
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- (d)(e) ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e)(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities. ~~If monitoring is required by Section D and the equipment~~**

~~is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

9. **OAQ shall remove the first year emission calculation from Condition D.1.2, because the first year ended on December 4, 2000.**

D.1.2 BACT VOC Limit [326 IAC 8-1-6]

Pursuant to the Significant Permit Revision 039-12282-00504, (issued December 4, 2000) to MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building, the input VOC shall be less than 25 tons per consecutive twelve (12) month period, so that the requirements of 326 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

~~During the first twelve (12) months of operation, the volatile organic material used shall be limited such that the total volatile organic material used divided by accumulated months of operation shall be less than VOC emission average of 2.08 tons per month, rolled on a monthly basis. Therefore, 326 IAC 8-1-6 will not apply.~~

10. **Condition D.1.7 (a)(2)(A) Monitoring contains a typo corrected as follows:**

- (2) Parametric Monitoring:
- (a) The Permittee shall take readings of the total static pressure drop across the dust collector, as least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3 to 6 inches of water. The Preventive Maintenance Plan for the dust collector **should be followed** when the pressure reading is outside of this range for any one reading.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Alpha Systems, Inc.
Source Location: 5100 Beck Drive, Elkhart, Indiana 46516
5120 Beck Drive, Elkhart, Indiana 46516
21680 Protecta Drive, Elkhart, Indiana 46516
Mailing Address: 5120 Beck Drive, Elkhart, Indiana 46516
County: Elkhart
SIC Code: 2891
Operation Permit No.: T039-12831-00504
Permit Reviewer: Holly M. Stockrahm

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Alpha Systems, Inc. relating to an adhesive, fiberglass sink, counter top, and adhesive production operation.

Source Definition

Alpha Systems, Inc. consists of two (2) plants:

- (a) Beck Drive Plant (two (2) buildings), located at 5120 and 5100 Beck Drive, Elkhart, Indiana 46516; and
- (b) Protecta Drive Plant, located at 21680 Protecta Drive, Elkhart, Indiana 46516.

The two (2) plants are owned by one (1) person, located on the same property (contiguous property) and have the same owner but have different SIC codes: The Beck Drive Plant manufactures adhesives and sealants used exclusively by the motor home industry, with an SIC code of 2891. The Protecta Drive Plant manufactures fiberglass counter tops and sinks, with an SIC code of 3088.

IDEM has determined that Alpha Systems' three (3) plant buildings should be considered one (1) source and the source agrees.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

5120 Beck Drive Building

- (a) One (1) existing mix tank, used in the solvent-based adhesives production area, designed as M-1, increased maximum capacity to 500 gallons, this tank vents inside the building.
- (b) One (1) existing mix tank, used in the solvent-based adhesive production area, designed as M-2, increased maximum capacity to 400 gallons, this tank vents inside the building.
- (c) One (1) mix tank, used in the solvent-based adhesive production area, designed as M-3,

with a maximum capacity of 300 gallons, this tank vents inside the building.

5100 Beck Drive Building

- (d) One (1) stone mixer, identified as M1 which has a rated capacity of 2,219 pounds per hour (lb/hr). This mixer can only feed one (1) line at a time, either the flat sheet molding line, FS1 or the sink/counter top molding, C1.
- (e) One (1) flat sheet open molding line, identified as FS1 which has a rated capacity of 3,000 lb/hr. This facility is used to manufacture flat strips to match the counter tops in line C1. From this process, the flat strip is conveyed to the sawing and sanding operation, identified as S1 including various already permitted sanders and two (2) flat top sanders designated as FS-1, FS-2 for finishing as a final product. This operation is capable of sawing and sanding 1614 pounds per hour of product.

One (1) dust collector, identified as DC-1 used to control the particulate matter (PM) emissions coming from facility S1.

- (f) One (1) sink/counter top closed molding line, identified as C1 which is capable of molding 34 parts per hour. From this process, the parts are conveyed to the 0.8 million Btu/hr (MMBTU/hr) natural gas-fired dryer, identified D1 for drying as a final product.
- (g) One (1) stone mixer, designed as SM-1B, with a maximum capacity of 1500 lbs/hr and exhausts into the building.
- (h) Two (2) manual mixer, designed as MM-1 and MM-2, with a maximum capacity of 430 lbs each and exhausts into the building.
- (i) Miscellaneous use of solvents, waxes, cleaners and other VOC containing materials used to manufacture marble flat sinks and bowls.
- (j) One (1) Empire Blast Cabinet used to sand blast the marble tops, sinks and flat tops, vented to a dust collector designed as DC-2 and then internally.
- (k) Ten (10) hand grinders used for the final finish touch up operations are vented to dust collectors, designated as DC-3 to DC-6 and then internally. This operation is capable of grinding 538 pounds per hour.

Protecta Drive Plant:

- (l) One (1) marble top mold booth, designated as #1, with a maximum throughput of 0.125 units per hour, consisting of gel coat and resin application, controlled by dry filters for particulate matter over spray and exhausts to one (1) stack designated as SV-001.
- (m) One (1) glue line for polycarbonate skylights, with a maximum throughput of 37.7 units per hour and exhausts to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Space heaters, process heaters, or boilers using the following fuel:
 - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (Nine (9) natural gas-fired heaters, designated

- as C1-C9, with a maximum heat input capacity of 0.2 MMBtu/hr each and exhausts to the atmosphere) (At 5100 Beck, 0.8 million Btu/hr (MMBtu/hr) natural gas-fired dryer, identified D1) (At Protecta, ten (10) natural gas-fired infrared heater tubes, with a maximum heat input capacity of 0.1 MMBtu/hr each and exhaust to stacks designated as TH-001 thru TH-010), (At Protecta, four (4) natural gas-fired ovens, with a maximum heat input capacity of 2.5 MMBtu/hr each and exhaust to stacks designated as OVN-001 thru OVN-004)
- (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (b) The following VOC and HAP storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Cleaners and solvents characterized as follows:
- (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- (e) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (g) Heat exchanger cleaning and repair.
- (h) Paved and unpaved roads and parking lots with public access
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (k) Activities or categories of activities with individual or combinations of HAPs:
- (1) Four (4) organic storage tanks, designated as T1-T4, a maximum throughput of 140,000 gallons per year each, located above ground and exhausts to the atmosphere. Tanks designated as T1 and T2 are vertical fixed roof tanks. Tanks designated as T3 and T4 are flat top tanks.
 - (2) One (1) solvent-based adhesives production area, consisting of two (2) mixing vessels designated as M-1 and M-2, one (1) bulk product filling machine designated as F1, and exhausts to a stack designated as V1. M1 has a maximum raw material throughput of 586 pounds per hour and a maximum capacity of 300 gallons. M2 has a maximum raw material throughput of 277 pounds per hour and a maximum capacity of 275 gallons. F1 has a maximum raw material filling rate of 350 pounds per minute.

- (3) One (1) polyurethane adhesive production area.
 - (4) One (1) water-based adhesive production area.
 - (5) One (1) hot melt adhesive production area.
 - (6) Six (6) storage tanks, designed as T-5 to T-10, with a maximum throughput of 2500 gallons per year each, located above ground and vents inside the building. The tanks designed as T-5 to T-10 are vertical fixed roof tanks.
 - (7) One (1) bulk resin tank, designed as BRT-1, with a maximum capacity of 6,000 gallons and exhausts into the building.
 - (8) Four (4) natural gas-fired ovens, with a maximum heat input capacity of 2.5 MMBtu/hr each and exhaust to stacks designated as OVN-001 thru OVN-004 (emits slight levels of HAPS, also listed under insignificant for natural gas combustion units)
- (I) Other activities or categories not previously identified:
- Insignificant Thresholds:
Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxides (SO₂) = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOX) = 5 lbs/hour or 25 lbs/day Volatile Organic compounds (VOC) = 3 lbs/hr or 15 lbs/day
- (a) Nine (9) natural gas-fired heaters, designated as C1-C9, with a maximum heat input capacity of 0.2 MMBtu/hr each and exhausts to the atmosphere (also insignificant for natural gas combustion)
 - (b) One (1) rubber storage area.
 - (c) Four (4) vacuum former machines.
 - (d) One (1) woodworking and plastics machining area, subject to 326 IAC 6-3, with a maximum wood rate of 6.0 pounds per hour, a maximum plastic rate of 350.0 pounds per hour, exhausts to the atmosphere and consists of the following:
 - (1) Ten (10) inch table saw;
 - (2) Sixty (60) inch edge sander;
 - (3) Two (2) fourteen (14) inch band saws;
 - (4) Ten (10) inch swing saw;
 - (5) Three (3) router tables;
 - (6) One (1) vacuum former machine;
 - (7) One (1) CNC router;
 - (8) Miscellaneous hand operated saws, grinders and drills; and
 - (9) One (1) hydraulic press.
 - (e) Four (4) natural gas ovens (also listed as insignificant natural combustion and insignificant HAPS)
 - (f) 0.8 million Btu/hr (MMBtu/hr) natural gas-fired dryer, identified D1 (also listed as insignificant for natural gas combustion)
 - (g) ten (10) natural gas-fired infrared heater tubes, with a maximum heat input capacity of 0.1 MMBtu/hr each and exhaust to stacks designated as TH-001 thru TH-010 (also listed as insignificant for natural gas combustion)
 - (h) Ten (10) thirty (30) inch comfort fans.

- (i) Forklift operations.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Significant Permit Revision No. 039-12282-00504, (to MSOP No. 039-11066-00504), issued on December 4, 2000.
- (b) Minor Permit Revision No. 039-11874-00504 (to MSOP No. 039-11066-00504), issued on March 30, 2000.
- (c) MSOP No. 039-11066-00504, issued on October 6, 1999.
- (d) R No. 039-9958-00504, issued on November 19, 1998.

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 10, 2000.

There was no notice of completeness letter mailed to the source.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	396.6
PM-10	396.6
SO ₂	-
VOC	166.5
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
styrene	77.8
Dimethyl phylate	29.8
MEKP	24.3
Hexane	0.09
Vinyl Acetate	0.7
Toluene	0.3
Xylene	0.5
TOTAL	133.5

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀ and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1
PM-10	1
SO ₂	0
VOC	6
CO	0
NO _x	1
HAP	6

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Flat Top Sanders	0.25	0.25					
Blast Cabinet	0.02	0.02					
Storage Tanks T-5 to T-10				0.82			Hexane 0.09 Toluene 0.06 Vinyl Acetate 0.67
Hand Grinders	0.13	0.13					
Mixer tanks				0.15			styrene 0.15
Registration No. 039-9958-00504	0.20	0.20	0.00	6.33	0.20	0.80	MEK = 2.07; Toluene = 1.87; Hexane = 1.56; and Methylene Chloride = 9.45
Counter top/Sink Molding Line and including the use of products with VOC (i.e., solvents, waxes, etc)	0.00	0.00	0.00	<25	0.30	0.04	<10 single HAP** <25 combined HAPs**
Mold Booth 1	0.062	0.062	0.00	7.75	0.00	0.00	MEK = 0.004; Dimethyl Phthalate = 0.263; Methyl Chloride = 3.65; and Styrene = 2.07
Glue Line	0.00	0.00	0.00	0.00	0.00	0.00	MEK = 3.66
Woodworking/Plastic Machining	2.4	2.4	0.00	0.00	0.00	0.00	0.00
Infrared Tube Heaters	0.008	0.033	0.003	0.024	0.368	0.438	Hexane = 7.88E-03*
Ovens	0.08	0.09	0.03	0.24	3.68	4.38	Hexane = 7.88 E-02; Formaldehyde = 3.28E-03*
Total Emissions	7.95	8.23	0.033	39.31	4.55	6.02	MEK = 6.07; Vinyl Acetate 0.67; Toluene = 1.93; Hexane = 1.74; Dimethyl Phthalate = 0.263; Styrene = 11.22; Methylene Chloride = 13.1; and Formaldehyde = 3.28E-03

*Worst case HAPs emissions from combustion units.

**Limit established pursuant to 326 IAC 2-4.1, MSOP Significant Permit Revision 039-12282-00504.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR 60, Subpart Kb Storage Vessels (including Petroleum Liquid Storage Vessels) is not applicable because this regulation only applies to storage vessels with a capacity greater than 40 cubic meters (10,560 gallons).
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen

(15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Toxics)

Pursuant to Operation Permit NO. MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building (as described above) the input HAP shall be less than 10 tons of a single HAP or twenty-five (25) tons of a combination of HAPs per twelve (12) consecutive month period so that the requirements of 326 IAC 2-4.1 (Toxics) do not apply.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from

- (a) sawing and sanding with a process weight rate of 1614 pounds per hour shall not exceed 3.55 lb or PM per hour,
- (b) blasting with a process weight rate of 1 pound per hour shall not exceed 0.02 lb of PM per hour,
- (c) flat bed sanders and hand grinders with a process weight rate of 538 pounds per hour shall not exceed 1.7 lb of PM per hour,
- (d) woodworking and plastics machining operations with a process weight rate of 350 pounds per hour shall not exceed 1.28 lb of PM per hour,
- (e) marble top mold booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The correlating dust collectors and dry filters shall be in operation at all times the sawing and sanding, abrasive blasting, flat bed sanders and hand grinders, woodworking and plastics machining, and the marble top mold booth are in operation, in order to comply with this limit.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Pursuant to Operation Permit NO. MSOP 039-11066-00504, the facilities in the 5120 Beck Drive Building and the 5100 Beck Drive Building, the input VOC shall be less than 25 tons per consecutive twelve (12) month period, so that the requirements of 326 8-1-6 (New Facilities; General Reduction Requirements) do not apply.

During the first twelve (12) months of operation, the volatile organic material used shall be limited such that the total volatile organic material used divided by accumulated months of operation shall be less than VOC emission average of 2.08 tons per month, rolled on a monthly basis. Therefore, 326 IAC 8-1-6 will not apply.

326 IAC 8-9 (Volatile Organic Storage Vessels)

Pursuant to 326 IAC 8-9 (Volatile Organic Storage Vessels), the Permittee shall maintain records and submit the following to IDEM, for the volatile organic storage tanks with capacities less than 39,000 gallons:

- (a) the vessel identification number,
- (b) the vessel dimensions, and
- (c) the vessel capacity.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The sawing and sanding operation, blasting, hand grinding, woodworking and plastics machining, all controlled by dust collectors have applicable compliance monitoring conditions as specified below:
 - (a) Visible Emissions Notations:
 - (1) Visible emission notations of the blasting stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
 - (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (b) Parametric Monitoring:
 - (1) The Permittee shall take readings of the total static pressure drop across the dust collector, as least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the dust collector shall be maintained within the range of 3 to 6 inches of water. The Preventive Maintenance Plan for the dust collector when the pressure reading is outside of this range for any one reading.
 - (2) The instrument used for determining the pressure shall be subject to

approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (3) The gauge employed to take the pressure drop across the dust collector or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent (20%) of full scale and be accurate with $\pm 2\%$ of the full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
 - (4) An inspection shall be performed each calendar quarter of the dust collectors. Defective dust collectors shall be replaced. A record shall be kept of the results of the inspections and the number of dust collectors replaced.
 - (5) In the event that a dust collector's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been repaired or replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.
2. The spray coating has applicable compliance monitoring conditions as specified below:
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack SV-001 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dust collector and dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this adhesive, fiberglass sink and countertop manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T03912831-00504**.